

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION**

DIANE COWAN, et al.

PLAINTIFFS

and

UNITED STATES OF AMERICA

PLAINTIFF- INTERVENOR

v.

**Civil Action No. 2:65-CV-00031-DMB
(previously DC 6531-K)**

**BOLIVAR COUNTY BOARD OF
EDUCATION, et al.**

DEFENDANTS

SUPPLEMENT OF THE CLEVELAND SCHOOL DISTRICT TO PROPOSED PLAN

The Cleveland School District (the “District”) submits this supplement to its proposed plan, [108], submitted to the Court on January 23, 2015, and in support states as follows:

1. During and following the mediation conducted in this case by Magistrate Judge Jenny Virden on May 11, 2015, the District continued evaluating Plan A and Plan B as submitted to the Court and began working to craft a new plan to specifically address many of the concerns identified by Judge Virden, the Plaintiffs, and the Government during the mediation. The new plan, “Plan C,” is a direct result of this process. Plan C is attached as Exhibit 1.

2. The District discussed Plan C with the Government on May 12, 2015, and presented a written plan on May 13, 2015, as part of the parties’ continued negotiations. To the District’s knowledge the Government, continues to analyze Plan C and negotiations are on-going.

3. The District gives notice to the Court and the parties that it intends to present testimony regarding Plan C during the upcoming hearing in this case. (In a separate pleading, the District moves the Court for a continuance).

Respectfully submitted, this 14th day of May 2015.

/s/ John S. Hooks

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CERTIFICATE OF SERVICE

I, John Hooks, do hereby certify that I have this date served a true and correct copy of the above and foregoing document by electronically filing via the ECF system to:

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This, the 14th day of May 2015.

/s/ John S. Hooks